

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: C.R. BARD, INC.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2187

THIS DOCUMENT RELATES TO:

Crooks v. C.R. Bard, et al.

Civil Action No. 2:13-cv-29825

**MOTION TO WITHDRAW AS COUNSEL
OF RECORD FOR PLAINTIFF MARYANN CROOKS**

Pursuant to Local Rule 83.4, counsel for Maryann Crooks (“Plaintiff”), Tim K. Goss and Tamara L. Banno, both of Freese & Goss, PLLC, hereby requests the Court for an order allowing Tim K. Goss, Tamara L. Banno, and Freese & Goss, PLLC to withdraw as counsel of record for Plaintiff. In support, thereof, counsel states:

I.

On November 22, 2013, the undersigned counsel filed a Complaint on behalf of Plaintiff, alleging personal injuries sustained by Plaintiff after implantation of a pelvic mesh product manufactured by Defendant. Subsequent to filing, Plaintiff’s Counsel lost communication with the Plaintiff. This is despite numerous phone calls to Plaintiff’s home number and correspondences by certified mail to her last known address. Plaintiff has recently been informed via mail of Counsel’s intent to withdraw as counsel, as well as the availability of a Covidien settlement her counsel had reached for her claims, to which no response was received. Unable to communicate with Plaintiff and after exhausting all attempts to do so, the undersigned attorneys, Tim Goss and Tamara Banno, and the firm Freese & Goss, respectfully request that they be permitted to withdraw from this case.

II.

Counsel advised Plaintiffs by letter on December 14, 2016 of their intent to withdraw as counsel of record, and a copy of this motion will be served upon Plaintiff at her last known address of: 401 Oak Road, Harper , TX 78631.

III.

Plaintiff's counsel would request this Honorable Court enter an Order allowing withdrawal as attorney of record for Maryann Crooks.

RESPECTFULLY SUBMITTED, this 5th day of April, 2017.

/s/ Tim K. Goss

Tim K. Goss, Attorney-in-Charge

Texas Bar No. 08222660

tim@freeseandgoss.com

Tamara L. Banno

Texas Bar No. 24012240

tammy@freeseandgoss.com

Freese & Goss, PLLC

3500 Maple Ave., Ste. 1100

Dallas, TX 75219

Phone: 214-761-6610

Fax: 214-761-6688

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2017, I electronically filed the foregoing Motion to Withdraw as Counsel of Record for Plaintiff Maryann Crooks, with the clerk of the court using the CM/ECF filing system which will send notification of such filing to all counsel of record.

/s/ Tim K. Goss
Tim K. Goss, Attorney-in-Charge
Texas Bar No. 08222660
tim@freeseandgoss.com
Freese & Goss, PLLC
3500 Maple Ave., Ste. 1100
Dallas, TX 75219
Phone: 214-761-6610
Fax: 214-761-6688